



Ark-Tex Council of Governments
East Texas Council of Governments
Federal Communication Commission
Rural Broadband Experiments
CONNECT AMERICA EXPRESSION OF INTEREST



March 7, 2014

Chairman Thomas Wheeler
Commissioner Mignon Clyburn
Commissioner Jessica Rosenworcel
Commissioner Ajit Pai
Commissioner Michael O'Rielly
Jonathan Chambers
Federal Communications Commission
445 12th Street, SW 20024
Washington, DC

**Re: Expression of Interest – Rural Broadband Experiments
Connect America Fund, WC Docket No. 10-90**

Dear Chairman Wheeler, Commissioners, and Mr. Chambers,

The Ark-Tex Council of Governments (ATCOG), and the East Texas Council of Governments (ETCOG), comprised of 23 rural counties in Northeast Texas, offer this “Expression of Interest” to seek funding for the expansion of the broadband network in our regions under the Federal Communications Commission (FCC) Rural Broadband Experiments. ATCOG and ETCOG desire a coordinated effort between the two regions in the development of a strategy to provide broadband infrastructure and a commitment to a long-term vision to deliver universal broadband to every person in the **23 rural counties** of this area. We are dedicated to the strong vision of the local communities of these regions as well as the anticipated national policy that mirrors our efforts.

In line with this vision, ATCOG/ETCOG are proposing a next generation network experiment, by leveraging both expanded fixed fiber facilities and the pending **FirstNet Public Safety LTE** as mandated by the **NTIA**. This experiment would be unique to traditional broadband solutions as it would embrace a public-private partnership, expand affordable broadband access within our regions, and speed roll-out of the public safety broadband network. This proposed next generation network would also preserve competition among wireless carriers, provide suitable wireless replacement for antiquated high-cost technology, and act as a potential catalyst for NextGen 9-1-1. In addition, the network will be based on a Comprehensive Community Infrastructure by focusing on new and substantially upgraded connections to community anchor institutions. In essence, this proposed network will be a shared infrastructure for both rural broadband and the public safety broadband networks that will be available to, and cost effective for, last mile service providers to expand broadband to the ATCOG/ETCOG rural communities.

It is significant to say that **99.1% of the east Texas region is rural**, and most broadband providers find it cost prohibitive for the capital investment necessary to deploy or expand broadband services across the vast expanse of the ATCOG/ETCOG rural communities. **Based on the FCC eligible census blocks and tracts, the ATCOG/ETCOG region is 77.5% unserved/underserved in terms of broadband access.** These rural areas consistently have an average unemployment and illiteracy rate that exceeds the state average, and an average per capita income that is well below the state average. Left to pure market forces, the ATCOG/ETCOG rural areas will continue to have inferior technology or none at all. Therefore, the ATCOG/ETCOG region represent a prime candidate for the FCC rural broadband initiative as it will enhance competition to allow smaller, local providers to significantly reduce the increased cost of planned broadband expansions. By establishing public-private partnership with FirstNet for public safety, and collaborating with last mile internet providers in the region, access to affordable quality broadband services will be dramatically increased for the entire ATCOG/ETCOG region with the necessary funding. Based on a realistic and attractive return on investment for local and regional companies, it is the intent of ATCOG/ETCOG to administer a grant program that will provide 100% of the infrastructure cost to stimulate broadband service by the last mile providers.

ATCOG/ETCOG, as regional governmental bodies and subdivisions of the State of Texas, are capable of providing the following:

- Grant preparation and submission.
- Oversight and control of disbursement of grant funds.
- Grant administration in terms of reporting and compliance.
- Regional public/private support and awareness.
- Establishment and enhancement of public/private partnerships.
- Regional expansion of affordable “state of the art” broadband access as opposed to limited local expansion.
- Political support on a regional level.
- Shared infrastructure for rural broadband and public safety broadband.
- Assurance of anchor institution connectivity to enhance education, civil services, healthcare and economic development in the regions.
- Assurance of compliance with procurement procedures and governmental regulations.
- Compliance with the goals of the National Broadband Plan and ConnectedNation

It should also be emphasized that ATCOG/ETCOG have grant writing departments with professional staff that assist its member cities and counties in obtaining both state and federal grants to support economic development, infrastructure improvements, and public works activities. We have successfully submitted and administered grants awarded by the following list of organizations:

- | | |
|------------------------------------------------|------------------------------------------------------|
| • Economic Development Administration | • Northeast Texas Workforce Commission |
| • U. S. Department of Agriculture | • Texas Department of Economic Development |
| • Small Business Administration | • Texas Department of Transportation |
| • Housing and Urban Development | • Texas Department of Agriculture |
| • Environmental Protection Agency | • Federal Emergency Management Agency |
| • Homeland Security | • Criminal Justice Division of the Governor's Office |
| • Commission on State Emergency Communications | • Texas Department of Aging & Disability Services |
| | • Private foundations |

IDENTITY AND NATURE OF THE SUBMITTING ENTITIES

The Ark-Tex Council of Governments and the East Texas Council of Governments, both regional councils of local governments established under the authority granted by the Texas Legislature in 1965 (Article 1011 m. 2V.A.C.S) and two of 24 regional councils in Texas, have decided to express joint

interest to participate in the FCC Rural Broadband Experiments by proposing a rural broadband network covering both areas. These councils are members of the [Texas Association of Regional Councils](#). ATCOG/ETCOG serves Region 5 and 6, respectively, consisting of the following counties: Bowie, Cass, Delta, Franklin, Hopkins, Lamar, Morris, Red River, Titus, Anderson, Camp, Cherokee, Gregg, Harrison, Henderson, Marion, Panola, Rains, Rusk, Smith, Upshur, Van Zandt, and Wood.

The primary mission of ATCOG is to improve the quality of life for all citizens of the region on behalf of its member governmental organizations by providing a regional perspective on information and problem solving and by coordinating funding, resources, programs and services. Similarly, ETCOG assists local governments in planning for common needs, cooperating for mutual benefit, and coordinating for sound regional development. Services available in our region include but are not limited to the following:

- Environmental Planning/Brownfields Assessment
- Geographical Informational Systems/Mapping
- Homeland Security
- Area Agency on Aging
- Transportation
- 911 Services
- Housing Assistance
- FEMA Assistance
- Special Projects/Grants
- Workforce &Economic Development
- Solid Waste
- Air Quality Planning
- Special Projects Grants
- Criminal Justice

Our renewed efforts to obtain funding for the expansion of broadband services to the communities in our combined region are in line with the vision previously expressed in 2010 under the Broadband Technology Opportunities Program (BTOP) of the 2009 American Recovery and Reinvestment Act (ARRA). Although not funded, the BTOP application involved a request for funding of \$30-45 million, along with collaboration with broadband providers, telephone companies, electrical cooperatives and educational institutions which resulted in commitments that would have initially allowed for access to broadband services to only 30% of the region's residents. Our current proposal will reach 100% of the region's residents for \$20 million. During the application process for BTOP funding, ATCOG/ETCOG generated advocates from all sectors throughout the region, as well as financial support in the form of commitments in excess of \$2.1 million in cash and \$33 million of in-kind match, including \$11 million in right-of-way from the Texas Department of Transportation.

The BTOP experience has positioned ATCOG/ETCOG to be ready to pursue any new initiatives or opportunities to obtain funding for the expansion of broadband in our 23 county region, increase competition in the rural communities by embracing public-private partnerships, remove barriers to the private carriers such as access to rights-of-way, pipelines, tower access, etc. and expedite the roll out of new services in our region. ATCOG/ETCOG are in a position to spur investment, create jobs, encourage economic growth and provide the enthusiastic dedication needed to create a shared network infrastructure that will offer complete land coverage of our region.

PROPOSED SERVICE AREA

The ATCOG/ETCOG region comprises a 15,945 square mile area with a total population of 1,134,979 according to 2010 census data reports. The ATCOG/ETCOG population density per square mile averages 65.2. There are three Metropolitan Statistical Areas with the two regions—Tyler, Longview, and Texarkana, Texas. Land mass of the three cities totals 134.5 square miles, reducing the rural area to be served to 15,810.5 square miles, or 99.1% of the region. See attached maps.

With 99.1% of the vast east Texas region considered rural, most broadband providers find it cost prohibitive to invest the capital dollars necessary to deploy or expand broadband services in these

communities. Based on the FCC eligible census blocks and tracts, 77.5% of the residents are unserved/underserved. Increased broadband services in the rural communities can boost employment rates, literacy rates, and per capita income in these historically low performing areas.

This area contains a total of 183 eligible census tracts; however, due to the unique opportunity in east Texas for this project to include infrastructure sharing for both rural broadband and the Public Safety Broadband networks, **full land coverage** across the entire region can be achieved. The eligible census tracts for ATCOG/ETCOG, as provided by the FCC, are listed below:

COUNTIES	ELIGIBLE CENSUS TRACT ID
Bowie County, Texas	48037010902, 48037011100, 48037011200, 48037011300, 48037011401, 48037011402, 48037011501, 48037011502, 48037011600, 4803011700
Cass County, Texas	48067950100, 48067950200, 48067950300, 48067950400, 48067950500, 48067950600, 48067950700
Delta County, Texas	48119950100
Franklin County, Texas	48159950100, 48159950200
Hopkins County, Texas	48223950100, 48223950200, 48223950300, 48223950500, 48223950600, 48223950700, 48223950800
Lamar County, Texas	48277000102, 48277000200, 48277000300, 48277000402, 48277000500, 48277000600, 48277000700, 48277000800, 48277000900, 482770001000
Morris County, Texas	48343950100, 48343950200, 48343950300
Red River County, Texas	48387950100, 48387950500, 48387950600, 48387950700
Titus County, Texas	48449950100, 48449950200, 48449950300, 48449950400, 48449950500, 48449950600
Anderson County, Texas	48001950100, 48001950401, 48001950402, 48001950500, 48001950800, 48001950901, 48001950902, 48001951000, 48001951100
Camp County, Texas	48063950101, 48063950102, 48063950200
Cherokee County, Texas	48073950100, 48073950200, 48073950300, 48073950400, 48073950500, 48073950600, 48073950700, 48073950801, 48073950802, 48073950900, 48073951000, 48073951100
Gregg County, Texas	48183000200, 48183000300, 48183000401, 48183000402, 48183000501, 48183000502, 48183000600, 48183000700, 48183000900, 48183001000, 48183001100, 48183001200, 48183001300, 48183001400, 48183001500, 48183010100, 48183010200, 48183010301, 48183010302, 48183010400, 48183010500, 48183010600, 48183010700
Harrison County, Texas	48203020102, 48203020103, 48203020104, 48203020200, 48203020302, 48203020401, 48203020402, 48203020502, 48203020603, 48203020604, 48203020605, 48203020606
Henderson County, Texas	48213950100, 48213950200, 48213950300, 48213950400, 48213950500, 48213950602, 48213950700, 48213950800, 48213950901, 48213950902, 48213950903, 48213951100, 48213951200, 48213951300, 48213951400
Marion County, Texas	48315950100, 48315950200, 48315950300, 48315950400
Panola County, Texas	48365950100, 48365950200, 48365950300, 48365950500, 48365950600
Rusk County, Texas	48401950100, 48401950200, 48401950300, 48401950400, 48401950501, 48401950502, 48401950600, 48401950700, 48401951000, 48401951100, 48401951200
Smith County, Texas	48423000201, 48423000300, 48423000500, 48423000800, 48423001401, 48423001403, 48423001404, 48423001500, 48423001601, 48423001602, 48423001604, 48423001700, 48423001801, 48423001907, 48423001908, 48423002007, 48423002009, 48423002101, 48423002102, 48423002200
Upshur County, Texas	48459950100, 48459950200, 48459950300, 48459950400, 48459950500, 48459950600, 48459950700
Van Zandt County, Texas	48467950100, 48467950300, 48467950600, 48467950800, 48467950900, 48467951000
Wood County, Texas	48499950100, 48499950301, 48499950601, 48499950602, 48499950700, 48499950800

As evidenced in the chart below, a population of 857,819 residing in the eligible census tracts, or 77.5% of the total population of the ATCOG/ETCOG area, will be served by this project. Of the population to be served by this project, 188,412 persons in the eligible census tracts, or 22%, are aged 60+.

COUNTIES	TOTAL POPULATION	POPULATION TO BE SERVED	POPULATION AGED 60+ TO BE SERVED
Bowie County, Texas	92,460	53,662 (58%)	10,931
Cass County, Texas	30,324	30,324 (100%)	7,907
Delta County, Texas	5,240	3,159 (60.3%)	782
Franklin County, Texas	10,593	7,805 (73.7%)	2,349
Hopkins County, Texas	35,088	27,540 (78.5%)	6,420
Lamar County, Texas	49,740	41,138 (82.7%)	9,071
Morris County, Texas	12,914	12,914 (100%)	3,407
Red River County, Texas	12,795	12,795 (100%)	3,631
Titus County, Texas	32,045	26,346 (82.2%)	4,516
Anderson County, Texas	58,269	48,882 (83.8%)	8,926
Camp County, Texas	12,389	12,389 (100%)	2,805
Cherokee County, Texas	50,690	50,690 (100%)	10,633
Gregg County, Texas	121,451	113,940 (93.8 %)	21,914

Harrison County, Texas	65,958	59,157 (89.6%)	11,469
Henderson County, Texas	78,558	72,969 (92.8%)	19,089
Marion County, Texas	10,544	10,544 (100 %)	3,216
Panola County, Texas	23,814	12,975 (54.4%,)	2,940
Rusk County, Texas	53,211	36,982 (69.4%)	9,166
Smith County, Texas	209,691	122,014 (58.1%)	22,512
Upshur County, Texas	39,386	39,386 (100%)	8,789
Van Zandt County, Texas	52,507	35,876 (68.3%)	9,340
Wood County, Texas	41,927	26,332 (62.8%)	8,599
TOTAL COUNTIES	1,099,594	857,819 (78%)	188,412 (22%)

Source: U.S. Census Bureau, American FactFinder, 2008-2012 American Community Survey 5-Year Estimates

According to American FactFinder, 2008-2012 American Community Survey 5-Year Estimates, there are 222,483 families living in the eligible census tracts within the ATCOG/ETCOG region. 29,652, or 13.3%, of these families are living below the poverty level. The chart below provides a description per county of the families residing in the eligible census tracts that are living below poverty level.

ATCOG COUNTIES	# OF FAMILIES IN ELIGIBLE CENSUS TRACTS	% OF FAMILIES BELOW POVERTY LEVEL	# OF FAMILIES BELOW POVERTY LEVEL IN ELIGIBLE CENSUS TRACTS
Bowie County, Texas	13,724	14.07%	1,931
Cass County, Texas	7,942	15.5%	1,230
Delta County, Texas	793	9.6%	76
Franklin County, Texas	2,181	13.1%	286
Hopkins County, Texas	7,698	13.1%	1,010
Lamar County, Texas	11,064	16.1%	1,783
Morris County, Texas	3,435	14.1%	486
Red River County, Texas	3,355	12.9%	434
Titus County, Texas	6,415	15.5%	994
Anderson County, Texas	9,461	14.1%	1,334
Camp County, Texas	3,139	18.9%	593
Cherokee County, Texas	12,325	20.0%	2,465
Gregg County, Texas	29,050	13.5%	3,922
Harrison County, Texas	15,275	12.0%	1,833
Henderson County, Texas	19,013	13.0%	2,472
Marion County, Texas	3,096	15.1%	467
Panola County, Texas	3,525	7.0%	247
Rusk County, Texas	11,096	11.1%	1,232
Smith County, Texas	32,280	11.8%	3,809
Upshur County, Texas	10,681	10.1%	1,079
Van Zandt County, Texas	9,577	12.8%	1,226
Wood County, Texas	7,358	10.1%	743
TOTAL COUNTIES	222,483	13.3%	29,652

Source: U.S. Census Bureau, American FactFinder, 2008-2012 American Community Survey 5-Year Estimates

21.8% of the population in the eligible census tracts in the ATCOG/ETCOG region, or 186,623 persons, are students. 145,833 individuals are students enrolled in grades K-12; 37,088 are college undergraduates; and 3702 are graduate or professional school students. The chart below provides a description of the number of students in the eligible census tracts in the ATCOG/ETCOG region.

ATCOG COUNTIES	STUDENTS ENROLLED IN K-12	COLLEGE UNDERGRADUATES	GRADUATE, PROFESSIONAL SCHOOL	TOTAL # OF STUDENTS
Bowie County, Texas	9,945	1,975	339	12,259
Cass County, Texas	4,031	1,241	216	5,488
Delta County, Texas	543	144	37	724
Franklin County, Texas	1,401	279	31	1,711
Hopkins County, Texas	5,002	985	138	6,125
Lamar County, Texas	7,022	2,213	208	9,443
Morris County, Texas	2,307	515	96	2,918
Red River County, Texas	2,083	597	81	2,761
Titus County, Texas	5,653	1,178	97	6,928
Anderson County, Texas	7,417	2,125	112	9,654
Camp County, Texas	2,460	488	54	3,002
Cherokee County, Texas	9,774	2,133	155	12,062
Gregg County, Texas	20,394	6,205	500	27,099
Harrison County, Texas	8,781	3,011	276	12,068

Henderson County, Texas	8,752	2630	210	11,592
Marion County, Texas	1,368	266	33	1,667
Panola County, Texas	1,879	255	5	2,139
Rusk County, Texas	8,275	1754	138	10,167
Smith County, Texas	20,850	5473	581	26,904
Upshur County, Texas	7,280	1443	108	8,831
Van Zandt County, Texas	6,347	1159	190	7,696
Wood County, Texas	4,269	1019	97	5,385
TOTAL COUNTIES	145,833	37,088	3,702	186,623

Source: U.S. Census Bureau, American FactFinder, 2008-2012 American Community Survey 5-Year Estimates

INFORMATION ON THE NUMBER OF COMMUNITY ANCHOR INSTITUTIONS (Schools, Libraries, Government buildings, etc.)

The ATCOG/ETCOG region includes 1,054 anchor institutions consisting of K-12 schools, junior colleges, universities, hospitals, clinics, libraries, public safety agencies, workforce development, cities, counties, chambers of commerce and economic development groups. Unfortunately, the anchor institutions in the ATCOG/ETCOG region are limited to untenable services, such as latent and limited satellite and dial-up Internet access. Our goal is to overcome these crippling connectivity challenges through the deployment and implementation of a robust, secure, and extensible broadband network that meets the present needs of our region's anchor institutions and provides the platform for future needs.

ATCOG/ETCOG ANCHOR INSTITUTIONS

Category	Total
Schools K-12	92
Libraries	85
Healthcare Providers	118
Public Safety Entities	179
Fire Departments	342
911 Districts	5
PSAPS	31
Community Colleges	6
Institutions of Higher Education	2
Community Support Organizations	79
Government Facilities	115
TOTAL	1054

TECHNOLOGY TO BE DEPLOYED

In order to prepare for rapid deployment of the Public Safety Broadband Network (PSBN) in the ATCOG/ETCOG region, traditional Quad-play service to homes and businesses would be delivered over a Hybrid Fiber/Microwave infrastructure with LTE as the access technology. This network would provide complete geographic coverage for each census block utilizing the combined 700MHz Public Safety and commercial upper D block spectrum (FirstNet spectrum) through a Spectrum Lease agreement with FirstNet creating a Public-Private partnership. About 50% of the design will utilize existing backbone fiber leveraging legacy and BTOP built assets through IRU agreements with asset owners. Likewise, existing commercial, public safety and municipal tower infrastructure would also be re-used for the LTE Radio Access portion of the network. The resulting network could also foster additional rural infrastructure upgrades through the availability of hosted LTE Core and LTE RAN services for competitive Mobile Network Operators (MNOs) and competitive transport solutions for fixed facility operators (ILECs, CLECs and MSOs) in the regions.

Complete land coverage with 4/1 speeds for the regions can be achieved for under \$20 million dollars. However, additional enhancements can be accomplished to ensure complete First Net readiness and increased anchor services. Out of the 1,054 rural anchor institutions, it is proposed that:

- 10% will be served off network core (1 Gbps)
- 40% will be served off dedicated lateral (100 Mbps)
- 50% will be served off fixed wireless (10 Mbps)

As shown below, increased services can be accomplished with an additional \$14 million investment or \$46 million investment for a more concentrated coverage of the region. The coverage would be available to all providers to help promote competition and equalize prices among urban and rural customers.

Network CAPEX 10 mile Macro Cell Radius (6 sectors)				Network Capex 5 mile Macro Cell Radius (3 sectors)			
\$5,497,709	Network Transport Infrastructure			\$22,131,803	Network Transport Infrastructure		
7,940,891	Anchors served off core network node (1Gbps)			7,940,891	Anchors served off core network node (1Gbps)		
9,064,944	Anchors served off lateral extension (100Mbps)			9,064,944	Anchors served off lateral extension (100Mbps)		
377,706	Anchors served by LTE fixed wireless (10Mbps)			377,706	Anchors served by LTE fixed wireless (10Mbps)		
3,000,000	LTE Core Equipment			3,000,000	LTE Core Equipment		
5,229,936	LTE RAN Equipment			21,053,846	LTE RAN Equipment		
750,000	Dark Fiber IRU costs			750,000	Dark Fiber IRU costs		
1,050,000	HUB Core CAPEX			1,050,000	HUB Core CAPEX		
1,500,000	Back-Office Start-up Costs			1,500,000	Back-Office Start-up Costs		
\$34,411,186	Total CAPEX			\$66,869,190	Total CAPEX		

LEVERAGING FUNDS

Currently ATCOG/ETCOG provide and maintain the necessary network and equipment to ensure delivery of 9-1-1 calls to the proper answering point. We are working on NextGen 9-1-1 capabilities which could be used to offset some of the proposed setup. The Texas Commission on State Emergency Communications (CSEC) as well as ATCOG/ETCOG and other partner COGs are working to develop regional and statewide Next Generation Emergency Services IP Network (ESInet) systems. This network outlay designed in conjunction with the Broadband experiment could see significant savings in planning and installation.

CONTEMPLATED SERVICE OFFERINGS AND LIKELY PRICING OF SUCH OFFERINGS

The service offerings will be twofold in that the proposed network will serve both the public and private sectors. The network will operate as the platform for the FirstNet public safety program to accommodate future requirements to meet their developing standards. Therefore, it will supply the designated 20 MHz of spectrum set aside for FirstNet. However, in rural areas, it is pragmatic to utilize that spectrum to provide LTE access to the private sector. This will afford smaller carriers the opportunity to offer feature services comparable to Tier-1 markets by removing the roaming challenges and expense; thereby, increasing competition between carriers and resulting in savings for end users. Services offered will be the traditional Quad-Play (voice, video, data, and mobile) at a fixed broadband speed of 4 Mbps download/1 Mbps upload. Through our research, we anticipate the monthly cost to average \$35. This will be a 40% savings for those underserved areas with inferior service whose average cost is presently \$59 and an affordable price comparable to our urban counterparts for areas that currently have no service.

EXISTING PROVIDERS

There are a total of 46 providers in the ATCOG/ETCOG region with a broad disparity in services available. Depending on the geographic location, residents' options may be limited to dial-up service which is too slow for many applications, satellite service which is cost prohibitive for many homes, or no service available through any provider. In the most densely populated areas of the region, DSL and wireless services offer a broad assortment of options and features. Pricing is one of the largest issues in that the average price for rural access by satellite or inferior tower service is \$59 which is over 40%

higher than urban areas. This increased price also comes with capped data use. The increased availability of competition will help to equalize the market in both price and service availability.

Providers in the ATCOG/ETCOG Region

Allegiance Communications	ETEX Communications, LP	Skynet Country, LLC
Buford Media Group	Cobridge Communications, LLC	SW AR Telephone Cooperative
Argon Technologies	Gower Computer Support, Inc.	Sprint Nextel Corporation
AT&T Communications of TX Inc.	GoZoe Wireless, LLP	Spacenet, Inc.
Blossom Telephone Co., Inc.	Hughes Network Systems, LLC	Starnet Online Systems
CableONE Inc.	Internet America, Inc.	Cequel Communications
CenturyLink	Longview Cable Television, Inc.	Tatum Telephone Company
CKS Management, Inc.	MetroPCS Wireless, Inc.	Texas CellNet, Inc.
Clearwire Corporation	Mobinet, LLC	Tier One Converged Networks, Inc.
Consolidated Communications	NDemand, Inc.	T-Mobile USA, Inc.
DigiComm Enterprises, LLC	Northland Communications	Verizon Southwest, Inc.
East Texas Broadband	Peoples Communications, Inc.	ViaSat, Inc.
East Texas Cable	Cumby Telephone Cooperative, Inc.	Windstream Communications
East Texas DSL	JAB Wireless, Inc.	Zito Midwest, LLC
East Texas WiFi	Skycasters	Zulu Internet, Inc.
Eastex Telephone Cooperative, Inc	Network Communications	Conterra Broadband Service

In particular, strong interest in the broadband effort has been conveyed by Conterra Broadband Services; Eastex Telephone Cooperative, Inc.; Network Communications; Peoples Communications, Inc.; and Southwest Arkansas Telephone Cooperative.

SUMMARY

Based on the eligible census blocks and tracts as issued by the FCC, the rural areas in the ATCOG/ETCOG region are designated as 77.5% unserved/underserved. To add to the degree of difficulty, 15,810 square miles of the region (99.1%) are rural, making it difficult to attract competition. This severe need for broadband access coupled with, 1) the planned shared infrastructure with the public safety network, 2) grant management capabilities, 3) regional impact and support, and 4) prior significant involvement in broadband expansion, makes ATCOG/ETCOG an excellent applicant for FCC broadband funding. Therefore, this "Expression of Interest" is issued in anticipation of positive consideration for an invitation to submit a formal application. On behalf of its member counties, cities and citizens, ATCOG, ETCOG, and their respective employees would like to extend sincere appreciation to the FCC for this opportunity to be part of the Rural Broadband Experiment and its forthcoming reality for Rural America.



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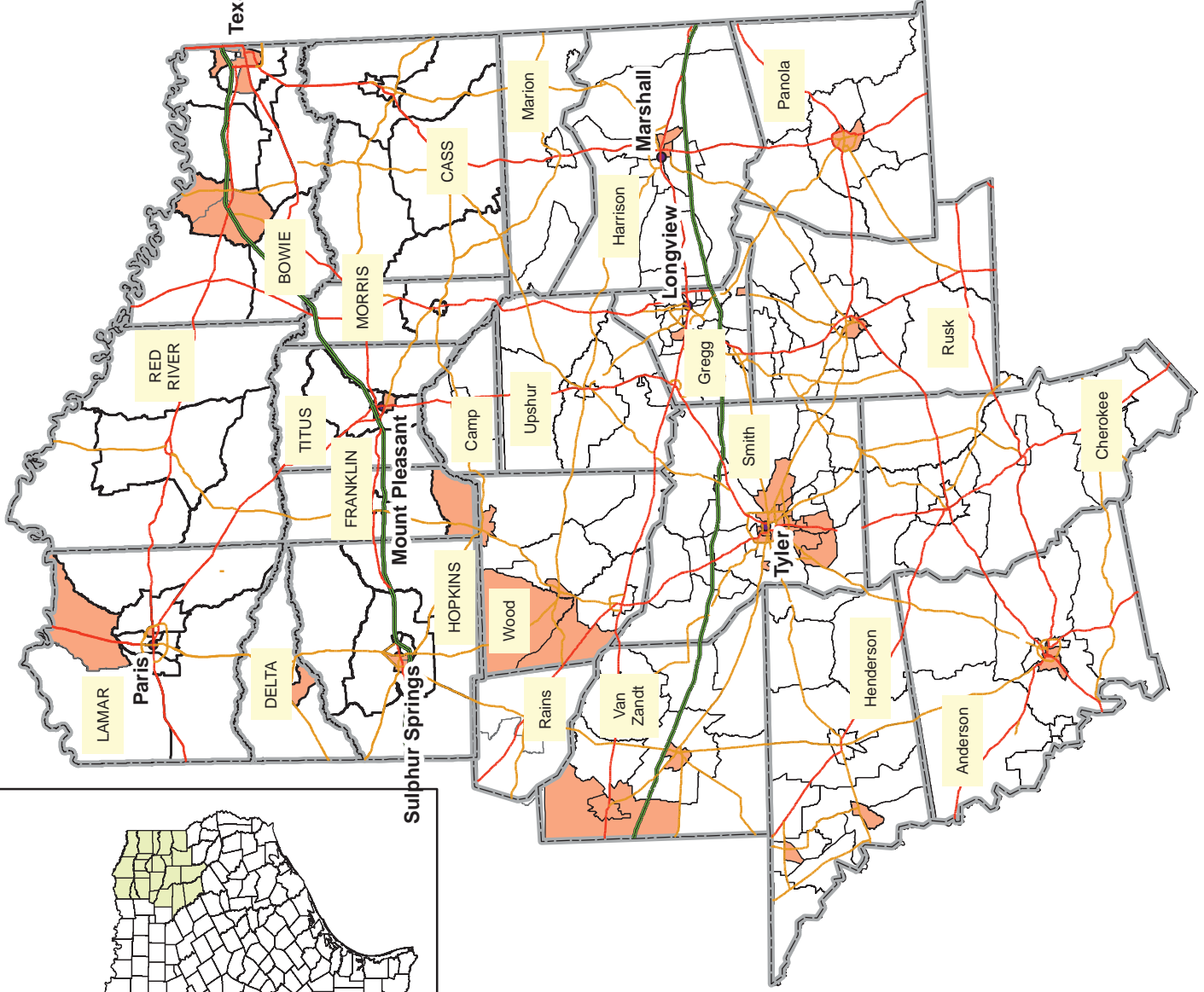


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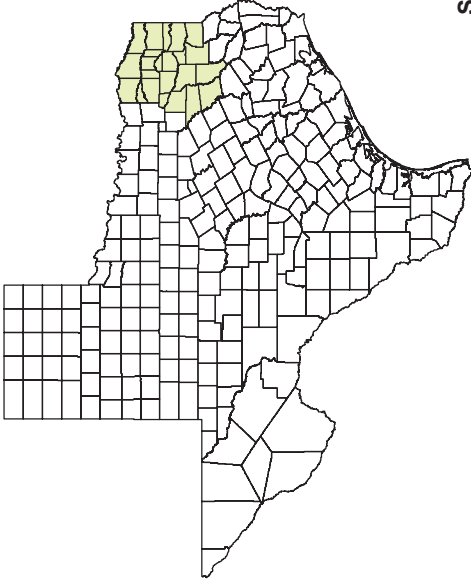
ATCOG/ ETCOG Census Tracts



Texarkana



Areas Served or
Un-/Underserve
ATCOG Census Tracts w/ Broadband
Served (16)
Un-/Underserved (50)
Served/Underserved
Served (40)
Un-/Underserved (133)
Not in Experiment (2)



Sulphur Springs

Mount Pleasant